

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Eileen Cera aka Eileen Schueller	:	CASE NO 18-17724 ELF
	:	
Debtor	:	Chapter 13
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NATIONSTAR MORTGAGE LLC	:	
D/B/A MR. COOPER	:	
Movant	:	
v.	:	
EILEEN CERA AKA EILEEN SCHUELLER	:	
Debtor	:	
and	:	
WILLIAM C. MILLER, ESQ.	:	
Trustee	:	
Respondents	:	

**RESPONSE OF DEBTOR TO  
MOTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362 AND 1301**

Debtor, Eileen Cera aka Eileen Schueller, by her attorney John M. Kenney hereby responds to the Motion of Nationstar Mortgage LLC d/b/a Mr. Cooper for Relief from the Automatic Stay, and responds accordingly as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. It is denied that the Debtor has failed to make the monthly payments for the period alleged.

8. Denied. It is denied that the total amount necessary to reinstate the loan post-petition is the amount alleged in paragraph 8 of the motion.
9. Denied. It is denied that the Movant is entitled to relief from stay for cause.
10. Denied.

**WHEREFORE,** Debtor, Eileen Cera aka Eileen Schueller, hereby prays this court would deny and dismiss the Motion of Nationstar Mortgage LLC d/b/a Mr. Cooper for Relief from the automatic stay.

Date: August 26, 2019

/s/ John M. Kenney, Esquire  
JOHN M. KENNEY, ESQUIRE  
Attorney for Debtor  
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